

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

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Sandra Rena Sullivan

\_\_\_\_\_  
\_\_\_\_\_  
(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. \_\_\_\_\_

MATA, The City of Memphis,

MATA employees, MATA

Union, Sean Jay-Z Carter, Beyonce Giselle Carter Knowles, Illuminatus

(Name of defendant or defendants)

**COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964**

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, Sandra Rena Sullivan  
(name of plaintiff)

is a citizen of the United States and resides at 6530 Castleriver Cove  
(street address)

Memphis,  
(city)

USA  
(country)

Tennessee  
(state)

38141  
(zip code)

(901) 264-1420  
(telephone number)

3. Defendant Memphis Area Transit Authority  
(defendant's name)  
 lives at, or its business is located at 1370 Levee Road Memphis, Tennessee  
(street address)  
38108

4. Plaintiff sought employment from the defendant or was employed by the defendant at  
1370 Levee Road Memphis, Tennessee  
(street address)  
Memphis United States of America TN 38108  
(city) (country) (state) (zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about 2nd April 2013  
(day) (month) (year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 2nd April 2013  
(day) (month) (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 2nd April 2013  
(day) (month) (year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 19th April 2013. (Attach a copy of the notice to this complaint.)  
(day) (month) (year)

9. Because of plaintiff's (1) \_\_\_ race, (2) \_\_\_ color, (3) X sex, (4) \_\_\_ religion, (5) \_\_\_ national origin, defendant

(a) X failed to employ plaintiff.

(b) \_\_\_ terminated plaintiff's employment.

(c) \_\_\_ failed to promote plaintiff.

(d) \_\_\_

10. The circumstances under which defendant discriminated against plaintiff were as follows: I applied for position of Small Bus MATA Plus Operator 11th day of October 2012 and I have not been contacted for interview or hire on the position for which it appears that I qualified for. I feel that I have been discriminated against because of my sex and MATA and its employees have made a slave of me working against my will in order for them to keep their jobs and deny me the opportunity for employment. They have used physical, emotional, mental and psychological abuse to ruin my reputation. I feel MATA has waged an effort to keep me from employment while I make complaints that are never really resolved while this employment is subtly yanking me with slavery and sexual sexual intimidation because I am female. Violation of Title VII Civil Rights Act 1964 as amended.

11. The acts set forth in paragraph 9 of this complaint

- (a) ☒ are still being committed by defendant.  
 (b) ☐ are no longer being committed by defendant.  
 (c) ☐ may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

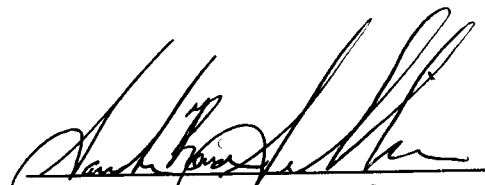
WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) ☐ Defendant be directed to employ plaintiff, or  
 (b) ☐ Defendant be directed to re-employ plaintiff, or  
 (c) ☐ Defendant be directed to promote plaintiff, or;  
 (d) ☒ Defendant be directed to employ plaintiff, back pay

plaintiff employment wages and/or salaries as of 11th day of October 2012, punitive damages for emotional distress, physical distress compensatory and all others that apply

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes (x) No ( )

  
 SIGNATURE OF PLAINTIFF